

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

<p>RALPH STRANO, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>KIPLINGER WASHINGTON EDITORS, INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 21-cv-12987-TLL-PTM</p> <p>Hon. Thomas L. Ludington</p> <p>Mag. Judge Patricia T. Morris</p>
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**UNOPPOSED MOTION FOR LEAVE TO FILE ENLARGED BRIEF IN
SUPPORT OF PLAINTIFF’S MOTION FOR ATTORNEYS’ FEES,
COSTS, EXPENSES, AND SERVICE AWARD**

Plaintiff Ralph Strano (“Plaintiff”), through his counsel, hereby moves the Court for leave to file an enlarged brief, not to exceed 35 pages, in support of his motion for attorneys’ fees, costs, expenses, and service award. In support of this Motion, Plaintiff states as follows:

1. On January 6, 2023, the Court preliminary approved the Parties’ proposed class action settlement, which, if finally approved, will fully and finally resolve all claims against Defendant Kiplinger Washington Editors, Inc. (“Defendant”) related to the Michigan Preservation of Personal Privacy Act (ECF

No. 26). Pursuant to the Parties' Settlement agreement, Plaintiff will move for attorneys' fees, costs, expenses, and a service award (the "Fee Petition), and intends to file that motion on April 10, 2023.

2. Plaintiff has made his greatest effort to keep the Fee Petition brief as succinct as possible. However, Plaintiff believes in good faith that the filing of a brief in excess of 25 pages is necessary to fully and effectively describe Plaintiff and the Class's allegations and claims, the litigation history, the work performed to benefit the class by Plaintiff and his counsel, and finally to discuss the reasonableness of the fees and costs sought under the Sixth Circuit's six-factor test.

3. As such, Plaintiff requests an extension of an additional 10 pages beyond that allowed by the local rules. *See* E.D. Mich. LR 7.1(d)(3)(A). Plaintiff's Fee Petition brief is 35 pages in length, inclusive of signatures.

4. Plaintiff's counsel conferred with counsel for Defendant, communicating via email, on April 3, 2023. Defendant does not oppose this motion nor to the relief requested herein.

THEREFORE, Plaintiff respectfully requests that the Court enter an Order granting him leave to file an enlarged brief, not to exceed 35 pages, in support of his forthcoming Motion for Attorneys' Fees, Costs, Expenses, and Service Award.

Dated: April 3, 2023

Respectfully submitted,

By: /s/ Philip L. Fraietta
One of Plaintiff's Attorneys

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Other Plaintiff's Counsel

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**BRIEF IN SUPPORT OF UNOPPOSED MOTION FOR
LEAVE TO FILE ENLARGED BRIEF IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEYS' FEES, COSTS, EXPENSES, AND SERVICE
AWARD**

Plaintiff, by and through his undersigned attorney, and in support of his Unopposed Motion For Leave to File Enlarged Brief in Support of Plaintiff's Motion for Attorneys' Fees, Costs, Expenses, and Service Award, relies on the content of Plaintiff's Motion.

Dated: April 3, 2023

Respectfully submitted,

By: /s/ Philip L. Fraietta
One of Plaintiff's Attorneys

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Other Plaintiff's Counsel

CERTIFICATE OF SERVICE

I, Philip L. Fraietta, an attorney, hereby certify that on April 3, 2023, I served the above and foregoing on all counsel of record by filing it electronically with the Clerk of the Court using the CM/ECF filing system.

/s/ Philip L. Fraietta

Philip L. Fraietta

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